

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO *et al.*, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendants.

CASE NO. 1:18-cv-01070-LM

**DECLARATION OF JANE DOE 2 IN SUPPORT OF
MOTIONS TO PROCEED UNDER PSEUDONYM [ECF No. 29 & 30]**

I, Jane Doe 2, declare as follows:

1. I make this Declaration based upon personal knowledge.
2. I am over 21 years of age and fully competent to make this Declaration. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.
3. I am a Plaintiff in the above-captioned action.
4. To my knowledge, my name has not been publicly revealed in connection with this lawsuit. I have never spoken with any member of the news media in connection with my allegations or this case. To my knowledge, I have never been publicly identified in any news coverage.
5. My allegations in the First Amended Complaint contain graphic details about the sexual assault and sexual harassment to which I was subjected by my professor while a student and employee at Dartmouth. I was very young when these actions occurred, and it is important to me that these sensitive and personal details remain private. I have shared the intimate details of the sexual assault with only a few close friends and family members, and my attorneys. I have sought support from therapists. I have told no one else what happened to me.

6. Because of my experiences at Dartmouth, I became extremely depressed and socially withdrawn from my friends and family. I was consumed by suicidal thoughts and contemplated suicide on numerous occasions.

7. I continue to suffer from the lasting effects of trauma, which drove me to seek a different career path in a different field. However, I have made significant progress in moving forward. I now have a full-time job and career.

8. I have taken comfort in the fact that this Court can allow me to join this lawsuit using a pseudonym.

9. When I learned that Dartmouth had filed an opposition to my use of a pseudonym, I suffered from severe anxiety and stress due to the terror of being publicly identified. Since then, I have experienced severe emotional distress. Recently, when a work supervisor asked me how I was doing, I became tearful and felt panicked. The thought of intimate details regarding my sexual history and emotional state being revealed to my coworkers, friends, family, patients, and the media fills me with great fear and anxiety. I fear that being publicly identified will have significant negative consequences for these individuals and my relationships to them, especially about my significant other and family. My fears are only magnified by the fact that bloggers and social media users will probably engage in hateful comments and discussions regarding my claims. I am certain that I will suffer severe emotional distress and an overall worsening of my physical and psychological health if forced to reveal my identity at this point.

10. I am so afraid of the consequences of being publicly identified that I do not think I will move forward if I am forced to publicly identify myself. I know that facing public identification will interfere with my emotional and physical well-being and interfere with my ability to process, cope with, and recover from my experiences at Dartmouth.

11. I also fear that publicly identifying myself will result in retaliation and reputational harm. Because of the nature of my current profession, I am afraid that publicly identifying myself in connection with this lawsuit will negatively affect my career. In particular, I fear that the stigma of public identification will harm my doctor-patient relationships as well as relationships with colleagues and supervisors.

12. Beside the great distress and panic it has caused me, Dartmouth's objection to the use of pseudonyms has deepened the sense of disappointment and betrayal I feel because of Dartmouth's actions. It feels like Dartmouth has adopted this bullying stance as a scare-tactic to try to intimidate me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: May 21, 2019

/s/ Jane Doe 2

Jane Doe 2